

# **EXHIBIT B**

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

STEPHAN A. RICKS

§

*Plaintiff,*

§

vs.

No. 1:22-cv-00773-LY-SH

DMA COMPANIES, DIANA MCIVER, NICHOLE  
GUPTILL, ROXANNE MARROQUIN, OPC SERVICES

§

§

§

§

*Defendants.*

§

**DEFENDANT OVERLAND, PACIFIC & CUTLER LLC'S  
OBJECTIONS AND RESPONSES TO PLAINTIFF'S REQUESTS FOR DISCOVERY**

TO: Plaintiff Stephan A. Ricks, 1302 Art Dilly Dr., Apt. 2143, Austin, Texas 78702;  
bigdaddy50000@gmail.com.

Pursuant to the Federal Rules of Civil Procedure, Defendant Overland, Pacific & Cutler LLC (“OPC”) serves its responses and objections to Plaintiffs’ Requests for Discovery. Defendant reserves the right to amend its responses and objections at a later time.

Dated: September 12, 2023

Respectfully submitted,



Katherine P. Chiarello  
Texas State Bar No. 24006994  
katherine@bccaaustin.com

**BOTKIN CHIARELLO CALAF, PLLC**  
1209 Nueces Street  
Austin, Texas 78701  
T: (512) 615-2341  
F: (737) 289-4695

**ATTORNEY FOR DEFENDANT  
OVERLAND, PACIFIC & CUTLER, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served on Plaintiff via email and Certified Mail Return Receipt Requested, this 12th day of September 2023 at the following address.

Stephan A. Ricks  
1320 Art Dilly Dr., Apt. 2143  
Austin, TX 78702  
Bigdaddy50000@gmail.com

*/s/ Katherine P. Chiarello*  
Katherine P. Chiarello

## **GENERAL OBJECTIONS**

1. OPC objects to Plaintiff's Requests for Discovery because they impose obligations on OPC that are inconsistent or greater than those required by the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Western District of Texas. OPC will interpret Plaintiff's requests consistent with Local Rule CV-26(b) and Federal Rule 34(a).
2. OPC objects to the extent that these Requests for Discovery contain no date restrictions whatsoever and are not limited in scope to the time period relevant to Plaintiff's claims—namely the date OPC first communicated with Plaintiff regarding coordinating his move and the date OPC completed its coordination of Plaintiff's move.
3. OPC objects to these Requests for Discovery because they are not limited in scope to matters relevant to Plaintiff's claims.
4. OPC objects to these Requests for Discovery because they do not comply with the requirements of Federal Rule of Civil Procedure 34(b)(1) in that they do not (1) "describe with reasonable particularity each item or category of items to be inspected," or (2) "specify a reasonable time, place, and manner for the inspection and for performing the related acts." OPC, in good faith, will respond to the Requests for Discovery as drafted.
5. OPC objects to these Requests for Discovery because they appear to be issued to all defendants together and thus include requests that are not or should not be directed to OPC. OPC, in good faith, will respond to the Requests for Discovery it understands to be directed to OPC.
6. OPC objects to these Requests for Discovery because they incorporate both information that appears intended to partially satisfy Plaintiff's obligations under Federal Rule of Civil Procedure 26(a)(1) (pages 1-1.5 of Plaintiff's document), and motions to the Court for (1) the issuance of subpoenas, (2) an "exemption for fees for accessing all information and records relevant to plaintiff, Stephan Ricks' case through PACER," and (3) the appointment of a special master (pages 6-7 of Plaintiff's document). Because these documents cannot properly be incorporated into or combined with Requests for Discovery, OPC, in good faith, will not further address them in these responses and objections.
7. OPC objects to these Requests for Discovery because Plaintiff has failed to comply with his obligations under Federal Rule of Civil Procedure 26(a)(1) and the Agreed Scheduling Order (Dkt. 46) in this case, which required Plaintiff to serve his initial disclosures on or before July 27, 2023. To date, OPC has not received a complete set of initial disclosures from Plaintiff, nor has it received any document clearly identified as initial disclosures from Plaintiff that complies with Federal Rule of Civil Procedure 26(a)(4).
8. OPC objects to these Requests for Discovery because they purport to demand depositions of individuals and production of documents by the deponents (bottom of page 4-page 5 of Plaintiff's document), as the demand for depositions does not comply with Federal Rule of Civil Procedure 30(b). Because none of the individuals listed by Plaintiff are related to OPC, OPC, in good faith, will not further address these requests in these responses and objections.

## **SPECIFIC OBJECTIONS**

And to compel the aforementioned defendants to turn over all

1. electronic documents

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not “describe with reasonable particularity each item or category of items” requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff’s claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff’s claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC’s possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

2. emails

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not “describe with reasonable particularity each item or category of items” requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff’s claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff’s claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC’s possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

### 3. voicemails

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not “describe with reasonable particularity each item or category of items” requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff’s claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff’s claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC’s possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

### 4. text messages

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not “describe with reasonable particularity each item or category of items” requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff’s claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff’s claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC’s possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

### 5. Photographs

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not “describe with reasonable particularity each item or category of items” requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC

objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff's claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff's claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC's possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

#### 6. all work orders

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not "describe with reasonable particularity each item or category of items" requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff's claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff's claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC's possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

#### 7. all fire marshal inspections

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not "describe with reasonable particularity each item or category of items" requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not properly directed to OPC. OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff's claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to

Plaintiff's claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC's possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

8. HUD property inspections including the names of all the HUD inspectors

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not "describe with reasonable particularity each item or category of items" requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not properly directed to OPC. OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff's claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff's claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC's possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

9. leases

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not "describe with reasonable particularity each item or category of items" requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not properly directed to OPC. OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff's claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff's claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC's possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications

protected by the attorney-client privilege or work product doctrines.

10. electronic recordings

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not “describe with reasonable particularity each item or category of items” requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff’s claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff’s claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC’s possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

11. appointment schedules

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not “describe with reasonable particularity each item or category of items” requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff’s claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff’s claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC’s possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

12. written communications documents

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not “describe with reasonable particularity each item

or category of items” requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff’s claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff’s claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC’s possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

#### 13. Facebook

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not “describe with reasonable particularity each item or category of items” requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff’s claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff’s claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC’s possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

#### 14. Twitter

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not “describe with reasonable particularity each item or category of items” requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff’s claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited

in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff's claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC's possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

#### 15. Tic Tok

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not "describe with reasonable particularity each item or category of items" requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff's claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff's claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC's possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

#### 16. WhatsApp

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not "describe with reasonable particularity each item or category of items" requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff's claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff's claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC's possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually

obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

17. Signal

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not “describe with reasonable particularity each item or category of items” requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff’s claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff’s claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC’s possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

18. Instagram

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not “describe with reasonable particularity each item or category of items” requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff’s claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff’s claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC’s possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

19. Duo, and any other social media platforms

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not “describe with reasonable particularity each item or category of items” requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff’s claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff’s claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC’s possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

20. any and all past and pending lawsuits from 2011 to 2023 against the defendants OPC and DMA Properties

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not “describe with reasonable particularity each item or category of items” requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff’s claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff’s claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC’s possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

21. The names and telephone numbers of all custodians of all records

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not “describe with reasonable particularity each item or category of items” requested, or otherwise comply with Federal Rule of Civil Procedure

34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff's claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff's claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC's possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

22. The location of where all records are stored

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not "describe with reasonable particularity each item or category of items" requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff's claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff's claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC's possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

23. lawsuits, specifically against DMA Properties and employees working for DMA Properties

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not "describe with reasonable particularity each item or category of items" requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not properly directed to OPC. OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff's claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff's claims. OPC objects to the extent this request seeks the production of documents,

communications, and things that are outside OPC's possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

24. The policies and procedures for the retention of all records

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not "describe with reasonable particularity each item or category of items" requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff's claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff's claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC's possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

25. The names of insurance companies and telephone numbers and contact persons

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not "describe with reasonable particularity each item or category of items" requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff's claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff's claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC's possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

26. The monetary amount of their insurance policies

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not “describe with reasonable particularity each item or category of items” requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff’s claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff’s claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC’s possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

27. all other communications relevant to plaintiff, Stephan Ricks’ case, from 2010 to the present

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not “describe with reasonable particularity each item or category of items” requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff’s claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff’s claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC’s possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

28. The names and telephone numbers of all

1.OPC

2.DMA employees former and present who have or have had access to plaintiff, Stephan Ricks, records from 2013 to 2023

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not “describe with reasonable particularity each item or category of items” requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff’s claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff’s claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC’s possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.

29. All information stored on current or former employees smart phones as well as home personal computers

**RESPONSE:** OPC objects to this request because Plaintiff has failed to state a claim against OPC. OPC objects to this request because it does not “describe with reasonable particularity each item or category of items” requested, or otherwise comply with Federal Rule of Civil Procedure 34(b)(1). OPC objects to this request because it is not proportional to the needs of the case. OPC objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence relevant to Plaintiff’s claims. OPC objects to this request as confusing, unclear, vague, and ambiguous. OPC objects to this request because it is overly broad, unduly burdensome, harassing, and a fishing expedition. OPC further objects to the extent that this request is not limited in time or scope, and seeks documents, communications, and things outside of the relevant time period and unrelated to Plaintiff’s claims. OPC objects to the extent this request seeks the production of documents, communications, and things that are outside OPC’s possession, custody, or control. OPC objects to the extent this request seeks the production of document, communication, and things that contain highly sensitive information regarding non-parties, trade secret and proprietary information of OPC, or information for which OPC is contractually obligated to maintain confidentiality. OPC objects to the extent that this request seeks the production of documents and communications protected by the attorney-client privilege or work product doctrines.